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June 13, 2025

Via ECF:

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: **Morales et al v. The Riverdale Management Group LTD. et al.**
Civil Docket No.: 1:24-cv-04474-KPF

Dear Judge Failla:

We represent the Plaintiff in the above-referenced matter and we submit this motion jointly with counsel for Defendants to respectfully request an extension to file the parties' proposed settlement agreement and motion for settlement approval pursuant to *Wolinsky v. Scholastic, Inc.*, 900 F. Supp. 2d 332, 335-336, and pursuant to the Court's April 30, 2025 Order. The motion for settlement approval is currently due June 13, 2025.

The parties have finalized their proposed settlement agreement and Plaintiff has already executed the agreement. A draft of the motion for approval has also been circulated. At this time, we are just awaiting Defendants' signatures to the agreement and Defendants' edits to the motion so that the documents may be submitted for the Court's review. Therefore, we respectfully request that the time to file be extended two weeks from June 13, 2025 to June 27, 2025. This is the second request for an extension of time of this deadline; the first request for an extension was granted by the Court. This request will not affect any other dates or deadlines.

We thank the Court for its consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

James O'Donnell
James O'Donnell, Esq.

CC: via ecf

Counsel for all Defendants

Application GRANTED. The parties' deadline to file their completed settlement agreement along with a joint letter regarding the fairness of the settlement agreement is hereby ADJOURNED to **June 27, 2025**. The parties are cautioned that no further extensions of this deadline will be granted, absent exigent circumstances.

The Clerk of Court is directed to terminate the pending motion at docket entry 48.

Dated: June 16, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE